

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

Civil Division

JAMES C. MAXEY, PRO SE

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Kirkland and Ellis LLP

Defendant(s) see attached

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	JAMES C. MAXEY
Street Address	5808 ENGLE ROAD #5
City and County	CARMICHAEL - COUNTY OF SACRAMENTO, CA.
State and Zip Code	CALIFORNIA 95608
Telephone Number	(916) 627-6544
E-mail Address	jamesmaxey1987@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Kirkland and Ellis LLP  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 2

Name United states Department of Justice  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 3

Name Merrick Garland  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 4

Name Jeffrey A. Rosen  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 5

Name

Robert M. Maxey

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 6

Name

Gary P. Summerhays

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 7

Name

Mormon church

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 8

Name

Lance Bradley Wickman

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)



Defendant No. 9

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Benjamin Wagner

Defendant No. 10

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

McGregor Scott

Defendant No. 11

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

John P. Carlin  
Deputy Attorney General

Defendant No. 12

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Richard Donoghue  
Deputy Attorney General

Defendant No. 13

Name

Eric Holder

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 14

Name

Loretta Lynch

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 15

Name

William Barr

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 16

Name

Jeff Sessions

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 17

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Anne Marie Schubert

Defendant No. 18

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Scott Jones

Defendant No. 19

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Emily F. Johannaber

Defendant No. 20

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Ramona Williams



Defendant No. 21

Name Federal Bureau of Investigation  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 22

Name National Security Agency  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 23

Name Central Intelligence Agency  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 24

Name California state Bar Association  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No.

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

D.L.A. Piper Global Law Firm

Defendant No.

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Christopher Wray  
Director, FBI

Defendant No.

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Paul M. Nakasone  
Director, National Security Agency

Defendant No.

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Scott Jones  
Sheriff, County of Sacramento



Defendant No. 25

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Gibson, Dunn and Crutcher LLP

Defendant No. 26

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Covington and Burling LLP

Defendant No. 27

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Paul, Weiss, Rifkind, Wharton  
and Garrison LLP

Defendant No. 28

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Venable LLP

Defendant No. 29

Name

Barack H. Obama

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 30

Name

Hillary R. Clinton

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 31

Name

William J. Clinton

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 32

Name

Clinton Foundation

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 33

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Angelique Ashby

Defendant No. 34

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Jonathan Paul

Defendant No. 35

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Kamala D. Harris

Defendant No. 36

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Doug Emhoff

and Does 1 through 2,000



**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case. **Title 18**

- A. If the Basis for Jurisdiction Is a Federal Question** **Sections 4, 47, 201, 225, 242, 610, 1001, 1028, 1113, 1117, 1510, 1512, 1514, 1962, 2331, 2332, 2338, 2340, 287 and 3771 of the United States Code**  
 List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. **Title 18 United States Code Sections 1520 and 1802, Crimes against humanity under the United Nations Covenants Against Torture, Trafficking and Human Experimentation, as well as, Title 22 USC Section 7102(a), Title 28 USC Section 1350 and California Civil Code Section 52.7.**
- B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) JAMES C. MAXEY, is a citizen of the  
 State of (name) THE UNITED STATES.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
 under the laws of the State of (name) \_\_\_\_\_,  
 and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
 the State of (name) \_\_\_\_\_. Or is a citizen of  
 (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) Kirkland and Ellis LLP, is incorporated under the laws of the State of (name) United States and has its principal place of business in the State of (name) United States.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

- please see attached -

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

- please see attached -

B. What date and approximate time did the events giving rise to your claim(s) occur?

From on, or about, June 26, 2013, through, the present time, Kirkland and Ellis LLP has unlawfully conspired with Sacramento County District Attorney Anne Marie Schubert and Judicial Council of California, as well as, others to file and adjudicate false, fictitious, fake and fraudulent lawsuits using the Plaintiff's identity without his knowledge.



SHORT TITLE:

CASE NUMBER:

ATTACHMENT (Number): \_\_\_\_\_

(This Attachment may be used with any Judicial Council form.)

## Statement of Claim (Continued)

A. From on, or about, July 22, 1969, through, the present time, the above-described criminal enterprise has financially, politically and religiously exploited the microchip technology implanted into the Plaintiff in an orchestrated, organized and systematic plan in which he has been trafficked and forced into non consensual and involuntary service as a 'guinea pig' and 'biological robot' for involuntary human experimentation and the research and development of: (1) a government research neuroscience program; (2) neurological research into 'radiation'; (3) neurological research into 'mind control'; (4) neurological research into Remote Neural Monitoring as well as, microwave and electromagnetic torture; (5) surveillance through the use of electrical activity from the visual cortex of his brain seen on a video monitor and publicly displayed (the Defendants are able to see what the Plaintiff's eyes are seeing); and, (6) neurological research into 'behavior modification' service as a 'guinea pig' for the research and development of GPS technologies World-wide. The Defendants have illegally subjected the Plaintiff to imposed observation and tracking of his movements, belongings, person and surroundings through the use of GPS technologies, electronic listening devices, video recording, special imaging and every other means of observing his possessions and routines.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page \_\_\_\_\_ of \_\_\_\_\_

(Add pages as required)



- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

From on or about, November 10, 2020, through, the present time, Kirkland and Ellis LLP has committed Fraud upon the U.S. District Court for the Eastern District of California and U.S. Court of Appeals for the Ninth Circuit through Fraud, deceit and coercion of judicial officials

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#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

THE PLAINTIFF HAS SUFFERED IRREPARABLE PHYSICAL AND MENTAL INJURY, AS WELL AS, IRREPARABLE DAMAGE AND HARM TO HIS REPUTATION AND GOOD NAME.

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#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

THE PLAINTIFF DEMANDS the immediate transfer of his Filings with the United States District Court for the Eastern District of Tennessee to the Eastern District of California and a preliminary injunction ordering all relief he is entitled to.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/23/2021

Signature of Plaintiff

Printed Name of Plaintiff



JAMES C. MAXEY

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address